

October 28, 2004

To Whom It May Concern:

This letter is sent to you to ensure that all carriers using Nebraska numbering resources understand the current situation with regards to the forecasted exhaust date for numbering resources in Nebraska. The Commission expects all carriers to cooperate with our proactive efforts to extend the life of the remaining resources.

Nebraska Numbering Resources Background

When the Nebraska Public Service Commission (Commission) was notified on May 26, 1999 by the North American Number Plan Administrator that the number of assignable prefixes for area code 402 were projected to exhaust in the fourth quarter of 2000, we initiated certain measures which continue today.

On June 8, 1999 the Commission opened public investigation C-2057/PI-28 which ultimately identified several problems regarding the utilization and conservation of assignable telephone numbers. The Commission found that employing number conservation methods could significantly delay the need for area code relief measures such as area code boundary changes, splitting the 402 area code or introducing an overlay of a new area code.

On September 14, 1999, the Commission filed a petition with the FCC requesting authority to implement conservation methods, with special attention on the 402 area code. Specifically, the Commission requested authority to: implement number pooling in thousands-block intervals, to reclaim unused exchange codes that had been distributed and to audit number assignment and distribution activities of service providers. The FCC granted our petition on July 20, 2000.

Other actions taken by the FCC and the Commission in the conservation of numbering resources are: July 1, 2001 was set as the deadline by the FCC for implementation of thousands-block number pooling in the Omaha MSA by LNP capable carriers, during the Fall of 2002 the Commission staff and Qwest had a series of discussion which resulted in consolidation of nine rate centers into four rate centers, in the Spring of 2003 the FCC designated the 308 area code as "voluntary" for thousands-block number pooling, on April 5, 2004 the status of all rate centers in the 402 Area Code outside of the Omaha MSA were reclassified from "excluded" to "voluntary" for thousands block number pooling.

The following table demonstrates the positive impact the Commission and the cooperative actions of the carriers of Nebraska have had on the forecasted exhaust date for the Nebraska area codes.

State	NPA	†1998	†1999	†2000	2001	2002	2003	2004
Nebraska	308	1Q2077	4Q2032	1Q2032	4Q2033	2Q2026	2Q2026	2Q2026
	402	2Q2004	4Q2000	2Q2001	1Q2004	1Q2005	2Q2005	2Q2006

†1998, 1999, & 2000 results were from the previous COCUS (Central Office Code Utilization Survey) as opposed to the NRUF (Number Resources Utilization Forecast) which was first instituted in 2000 and used in all forecasts from 2001 forward.

Current Status

The following information summarizes the current status of numbering resources in Nebraska.

Central Office Codes

Status of Central Office Codes in Nebraska as of October 18, 2004.

Area Code	Number of Rate Centers	Central Office Codes Assigned	Central Office Codes Available	*Forecasted Exhaust Date
308	178	300	477	2Q2026
402	283	707	76	2Q2006

* As of April 2004. Area Code 402 extended from 2Q2005 forecast in October 2003.

Voluntary Pooling

Voluntary Pooling has resulted in a low level of thousands-block donations and utilizations in each area code. At the request of the Commission, the Pooling Administrator reclassified all rate centers in the 402 Area Code outside of the Omaha MSA from “excluded” to “voluntary” pooling on April 5, 2004.

	Thousands-Blocks Assigned		Thousands-Blocks Available	
Area Code	Rate Centers	Thousands-Blocks	Rate Centers	Thousands-Blocks
308	17	26	39	294
402	28	120	60	707

Area Code 402 Forecasted Exhaust Date

NeuStar conducted a pro forma evaluation of the impact of mandatory pooling on the forecasted exhaust date for Area Code 402. The evaluation considered only those rate centers in which there are currently two or more carriers. The evaluation indicated that mandatory pooling could move the Area Code 402 forecasted exhaust date from the second quarter of 2006 to the third quarter of 2010.

Requested Actions

The Commission reminds all local exchange carriers and wireless carriers operating in the state that numbering resources allocated to Nebraska are for the use and benefit of the citizens of Nebraska. It is the responsibility of both the Commission and the carriers to use these resources wisely and take all actions appropriate to prolong the viability of the existing area codes.

To this end the Commission expects all carriers operating in Nebraska to take the following steps.

- ✓ Take every possible action to conserve the numbering resources in both area codes but most especially Area Code 402.
- ✓ Donate unused thousands-blocks to the pool and go to the pool first when numbering resources are needed.
- ✓ Contact the Commission for help in locating and identifying possible resources before requesting a full code from the North American Numbering Plan Administration (NANPA).
- ✓ Share expansion plans with the Commission as far in advance as possible. This will provide both parties an opportunity for a pro-active review of numbering resource needs and more time to exhaust all possible alternatives prior to the issuance of a new code.
- ✓ Assign all available telephone numbers within an opened thousands-block before assigning telephone numbers from an uncontaminated thousands-block. This applies to a service provider's existing numbering resources as well as any new numbering resources it obtains in the future.

We will be seeking input from all carriers on additional steps that can be taken to extend the life of the Nebraska area codes.

Sincerely,

Gerald L. Vap, Chairman